

EXHIBIT A

CT

IN THE CIRCUIT COURT FOR KNOX COUNTY, TENNESSEE

LESLIE CLABO,

Plaintiffs,

v.

JOHNSON & JOHNSON HEALTH CARE
SYSTEMS, INC., and
ETHICON ENDO-SURGERY, INC. f/k/a
ETHICON, INC.

Defendants.

No. 1-223-13

FILED

2013 MAY 6 PM 12:5

CATHERINE F. QUIST
CIRCUIT COURT CLERK

SUMMONS

TO: Johnson & Johnson Health Care Systems, Inc.
C.T. Corporate Systems
800 S. Gay Street, Suite 2021
Knoxville, TN 37929

You are hereby summoned and required to serve upon: Richard Baker, Plaintiff's attorney, Post Office Box 1481, Knoxville, Tennessee 37901-1481, a true copy of the answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. You will file the original with the Court. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Issued this 16 day of May, 2013 at _____ o'clock _____ M.

By: Catherine F. Shantz

Clerk

Deputy Clerk

(This summons is issued pursuant to Rule 4 of the Tennessee Rules of Civil Procedure.)

NOTICE

TO THE DEFENDANT (S):

Tennessee law provides a ten thousand dollar (\$10,000.00) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution of garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family, and trunks or receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

Received this 8 day of May, 2013 at B.C. Bryant #B1364 Deputy Sheriff

RETURN ON SERVICE OF SUMMONS

Served Special Assistant Secretary

I hereby certify and return that on the MAY 16, 2013 day of May 2013 I served this summons together with the

complaint as follows: Erica Fry

System is Registered Agent for

Johnson & Johnson Health Care Systems Inc.

Sheriff-Deputy Sheriff

ATTEST

Certified a True Copy

Case 3:13-cv-00154-CLC-DGP Document 1-1 Filed 06/12/13 Page 2 of 10 PageID #: 8

Circuit Court Clerk

IN THE CIRCUIT COURT FOR KNOX COUNTY, TENNESSEE

LESLIE CLABO,

Plaintiffs,

v.

JOHNSON & JOHNSON HEALTH CARE
SYSTEMS, INC., and
ETHICON ENDO-SURGERY, INC. f/k/a
ETHICON, INC.

Defendants.

No. 1-223-13

FILED *E*

2013 MAY 6 PM 12

CATHERINE F. QUINN
CIRCUIT COURT CLERK

SUMMONS

TO: Johnson & Johnson Health Care Systems, Inc.
C.T. Corporate Systems
800 S. Gay Street, Suite 2021
Knoxville, TN 37929

You are hereby summoned and required to serve upon: Richard Baker, Plaintiff's attorney, Post Office Box 1481, Knoxville, Tennessee 37901-1481, a true copy of the answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. You will file the original with the Court. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Issued this 10 day of May, 20 13 at _____ o'clock 7 M.

Catherine F. Quinn
Clerk

By: Gregory E. Wheeler
Deputy Clerk

(This summons is issued pursuant to Rule 4 of the Tennessee Rules of Civil Procedure.)

NOTICE

TO THE DEFENDANT (S):

Tennessee law provides a ten thousand dollar (\$10,000.00) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution of garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family, and trunks or receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

Received this _____ day of _____, 20_____, _____, Deputy Sheriff

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the _____ day of _____, 20_____, I served this summons together with the complaint as follows: _____

ATTEST

Certified a True Copy

Case 3:19-cv-00154-OLC-DCP Document 1-1 Filed 06/12/13 Page 3 of 10 PageID #: 9

Circuit Court Clerk

Sheriff-Deputy Sheriff

CT

IN THE CIRCUIT COURT FOR KNOX COUNTY, TENNESSEE

FILED

2013 MAY 6 PM 1

CATHERINE F. QU
CIRCUIT COURT CL

LESLIE CLABO,

Plaintiffs,

v.

No. 1-223-13

JOHNSON & JOHNSON HEALTH CARE
SYSTEMS, INC., and
ETHICON ENDO-SURGERY, INC. f/k/a
ETHICON, INC.

Defendants.

SUMMONS

TO: Ethicon Endo-Surgery, Inc. f/k/a Ethicon, Inc.
C.T. Corporate Systems
800 S. Gay Street, Suite 2021
Knoxville, TN 37929

You are hereby summoned and required to serve upon: Richard Baker, Plaintiff's attorney, Post Office Box 1481, Knoxville, Tennessee 37901-1481, a true copy of the answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. You will file the original with the Court. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Issued this 6 day of May, 2013 at o'clock M.
Catherine F. Shanks

By: James E. Wheeler
Clerk
Deputy Clerk

(This summons is issued pursuant to Rule 4 of the Tennessee Rules of Civil Procedure.)

NOTICE

TO THE DEFENDANT (S):

Tennessee law provides a ten thousand dollar (\$10,000.00) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution of garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family, and trunks or receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

Received this 8 day of May, 2013 at Bell County, TN # 13-864
Barbara C. Buzant Deputy Sheriff

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the May 15, 2013 day of May, 2013 at o'clock M. I served this summons together with the complaint as follows: Ericka Fry
System the Registered Agent for

Ethicon Endo Surgery Inc.
Company

Sheriff-Deputy Sheriff

ATTEST

Certified a True Copy

Case 3:13-cv-00154-SLC-DCP Document 1-1 Filed 06/12/13 Page 4 of 10 PageID #: 10
Circuit Court Clerk

IN THE CIRCUIT COURT FOR KNOX COUNTY, TENNESSEE

LESLIE CLABO,

Plaintiffs,

v.

JOHNSON & JOHNSON HEALTH CARE
SYSTEMS, INC., and
ETHICON ENDO-SURGERY, INC. f/k/a
ETHICON, INC.

Defendants.

No. 1-223-13

FILED 22

2013 MAY 6 PM

CATHERINE F. QUINN
CIRCUIT COURT CLERK

SUMMONS

TO: Ethicon Endo-Surgery, Inc. f/k/a Ethicon, Inc.
C.T. Corporate Systems
800 S. Gay Street, Suite 2021
Knoxville, TN 37929

You are hereby summoned and required to serve upon: Richard Baker, Plaintiff's attorney, Post Office Box 1481, Knoxville, Tennessee 37901-1481, a true copy of the answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. You will file the original with the Court. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Issued this 6 day of May, 2013 at _____ o'clock M

By: Catherine F. Quinn
Clerk
Joseph E. Hester
Deputy Clerk

(This summons is issued pursuant to Rule 4 of the Tennessee Rules of Civil Procedure.)

NOTICE

TO THE DEFENDANT (S):

Tennessee law provides a ten thousand dollar (\$10,000.00) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution of garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family, and trunks or receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

Received this _____ day of _____, 20_____, _____, Deputy Sheriff

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the _____ day of _____, 20_____, I served this summons together with the complaint as follows: _____

ATTEST

Certified a True Copy

Case 3:13-cv-00154-CLO-DCP

Circuit Court Clerk

Sheriff-Deputy Sheriff

IN THE CIRCUIT COURT FOR KNOX COUNTY, TENNESSEE

LESLIE CLABO,

Plaintiffs,

v.

JOHNSON & JOHNSON HEALTH CARE
SYSTEMS, INC., and
ETHICON ENDO-SURGERY, INC. f/k/a
ETHICON, INC.

Defendants.

Handwritten signature
FILED *CK*
No. 1-223013 6 PM 12.54
Handwritten signature
CATHERINE F. GUIST
CIRCUIT COURT CLERK

COMPLAINT

COMES now Plaintiff, Leslie Clabo, by and through counsel, and files suit against the Defendants, Johnson & Johnson, and Ethic on Endo-Surgery, Inc. f/k/a Ethicon, Inc., and for cause of action would show unto the Court the following:

29
148
1. That the Plaintiff Leslie Clabowas at all times relevant a resident citizen of Knoxville, Knox County, Tennessee.

2. That Defendant Johnson & Johnson., is a New Jersey corporation, doing business at 425 Hoes Lane Piscataway, NJ 08854-4103, and who directed its products into Tennessee, has designated C.T. Corporation System, 800 S. Gay Street, Suite 2021, Knoxville, TN 37929-9710, as its agent for service of process.

3. On information and belief, That the Defendant Ethicon Endo-Surgery, Inc., f/k/a Ethic on, Inc., is an Ohio corporation, which on information and belief is the wholly-owned subsidiary of defendant Johnson & Johnson whose agent for service is C.T. Corporation System, 800 S. Gay Street, Suite 2021, Knoxville, TN 37929-9710.

Page 1 of 4

ATTEST
Certified a True Copy
Handwritten signature
Circuit Court Clerk

4. That the Defendant(s) Johnson & Johnson and Ethicon Endo-Surgery, Inc., were at all times material the manufacturer and sellers of transvaginal mesh which were introduced into the stream of commerce during 2003 and thereafter, and at all times relevant to the allegations made herein.

5. That at all times the Plaintiff was prescribed a transvaginal mesh TVT sling procedure and on May 8, 2003 at Fort Sanders Parkwest Medical Center " Kit Device TVT w. Abd. Guide, Catalog # 610041A, Lot No. JCG03072 or (JOG03072), Item No. 70675" was implanted by her surgeon.

6. That periodically beginning about 2006 Plaintiff began to experience medical problems including pelvic pain,, infections, and others. On July 27, 2011, Plaintiff had to have additional surgeries for removal of a parts of the sling which had perforated tissue into her vaginal walls, the remaining mesh is continuing to perforate tissues and cause significant pain and other problems as a result, including mesh erosion, perforation into the other body parts, pelvic pain , urinary problems, scarring, dyspareunia, and neuropathic pain.

7. Plaintiff alleges she was unaware her continuing problems were associated with a defective product, and specifically the mesh until after July 27, 2012 when she was advised by a medical doctor friend of the probable association of TVT mesh and her continuing problems,

8. Plaintiff alleges she has never received any communication from the Defendants regarding any problems associated with this product.

9. That at all material times the Defendants owed a duty of reasonable care to manufacture a reasonable safe product to include adequate designing, testing and inspecting its products before sale, and to warn of known or learned of dangers associated with its products.

10. That at all material times the Defendants owed a duty not to introduce into the stream of commerce, including Tennessee, products which are defective or unreasonably dangerous to the consumer and may be liable to Plaintiffs under the Tennessee Products Liability Act, as codified at T.C.A. § 29-28-101, et seq.

12. That the Defendants, on information and belief, at all times material has misled the medical community regarding the safety and efficacy of the product, and that the product had "elastic properties that allow adaptation to physiological stresses" which it did not and as a result the product can perforate other organs and tissues causing the pain and the need for additional surgical procedures, which Plaintiff has had to undergo.

13. That as a direct and proximate result of the actions of Defendants, in placing an unreasonably dangerous and defective product on the market, the Plaintiff sustained serious harm including but not limited to abdominal and vaginal pain, recurrent infections, urinary issues, scarring dyspareunia and other problems, she has incurred and will incur additional medical expenses, and the loss of quality of life and mental anguish.

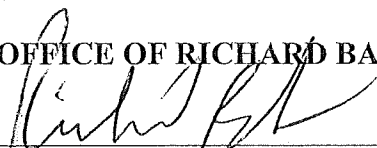
14. That the Defendants did intentionally misrepresent to the public the safety and efficacy of its product the TVT mesh, and intentionally and with callous disregard for the rights and safety of patients did place into the stream of commerce a product which had not been tested in human subjects, instead misrepresenting to doctors and patients that the product was "substantially equivalent to earlier approved devices" which had been demonstrated to be safe "through other tests." The product is unreasonably unsafe and Defendants intentionally misleading the public regarding the safety and efficacy of its products, and exposing Plaintiff and others to dangers which she was not required to otherwise encounter, which should subject the defendant to punitive

damages.

WHEREFORE, premises considered, Plaintiff Leslie Clabo sues each of the Defendants for the sum of Four Million Dollars (\$4,000,000.00), plus Five Million Dollars (\$5,000,000) exemplary damages and Plaintiff demands a trial by jury plus costs of this cause.

Respectfully submitted this 6th day of May, 2013.

LAW OFFICE OF RICHARD BAKER



RICHARD BAKER (BPR #013152)
Attorney for Plaintiff

Post Office Box 1481
Knoxville, Tennessee 37901-1481
(865) 633-6066

IN THE CIRCUIT COURT OF KNOX COUNTY, TENNESSEE
STATE OF TENNESSEE

FILED
2013 MAY 6 PM 12:58
Catherine F. Quist

Leslie Clabo)
_____)
Plaintiff(s))
VS.)
Johnson & Johnson et al.)
_____)
Defendant(s))

No. 1-223-13

CATHERINE F. QUIST
CIRCUIT COURT CLERK

COST BOND

1 Leslie Clabo

as Principal(s), and Richard Baker

as Surety, are held and firmly bound unto the Circuit Court Clerk of Knox County, Tennessee for the payment of all costs awarded against the principal. To that end, we bind ourselves, our heirs, executors and administrators.

The Principal(s) is/are commencing legal proceeding in the Circuit Court of Knox County, Tennessee. If the Principal(s) shall pay all costs which are adjudged against them then this obligation is void. If the Principal(s) fail to pay then the surety shall undertake to pay all costs adjudged against the Principal(s). Mandated at T.C.A. 20-12-120 et seq.

PRINCIPAL(S)

Leslie Clabo
(Print or Type) Principal

Social Security # _____

813 Black Oak Cir
Knoxville, TN 37922
Address
Employer

Employer's Address

Richard Baker p. *Leslie Clabo*
Principal

Social Security # _____

Address

Employer

Employer's Address

SURETY

Richard Baker
(Print of Type) SURETY

Richard Baker
SIGNATURE OF SURETY

P.O. 1481
Knoxville, TN 37901-1481
Address

ATTEST
Certified a True Copy
Catherine F. Quist
Circuit Court Clerk